## Exhibit 30

1 - Faller In

ORIGINAL 1 1 2 UNITED STATES DISTRICT COURT NEW YORK FOR THE EASTERN DISTRICT OF NEW YORK 3 4 MARTIN TANKLEFF, 5 Plaintiff, 6 -against-THE COUNTY OF SUFFOLK, K. JAMES McCREADY, 7 NORMAN REIN, CHARLES KOSCIUK, ROBERT DOYLE, 8 JOHN McLELHONE, JOHN DOE POLICE OFFICERS #1-10, RICHARD ROE SUFFOLK COUNTY EMPLOYEES 9 #1-10, 10 Defendants. 11 ----X 12 666 Old Country Road 13 Garden City, New York 14 June 10, 2013 15 10:43 a.m. 16 17 DEPOSITION of JERRY STEUERMAN, one of the Defendants herein, taken by the Plaintiff, 18 19 pursuant to Federal Rules of Civil Procedure 20 and Notice, held at the above-mentioned time 21 and place, before Dolly Fevola, Notary 22 Public of the State of New York. 23 24 25

2 1 2 APPEARANCES: 3 BARKET, MARION EPSTEIN & KEARON, LLP 4 Attorneys for the Plaintiff 666 Old Country Road 5 Garden City, New York 11530 BY: BRUCE BARKET, ESQ. 6 AMY MARION, ESQ. 7 8 SCARING & CARMAN, PLLC Attorneys for the Plaintiff 9 666 Old Country Road, Suite 501 Garden City, New York 11530 10 BY: SUSAN SCARING CARMAN, ESQ. 11 SUFFOLK COUNTY DEPARTMENT OF LAW 12 Attorneys for the Defendants H. Lee Dennison Building Hauppauge, New York 13 BY: BRIAN MITCHELL, ESQ. 14 15 ALSO PRESENT: 16 MARTIN TANKLEFF 17 PERRY FINKELSTEIN, Videographer 18 19 20 21 22 23 24 25

STIPULATIONS IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the respective parties hereto, that the filing, sealing and certification of the within deposition shall be and the same are hereby waived; IT IS FURTHER STIPULATED AND AGREED that all objections, except as to form of the question, shall be reserved to the time of the trial; IT IS FURTHER STIPULATED AND AGREED that the within deposition may be signed before any Notary Public with the same force and effect as if signed and sworn to before the Court. 

1 J. Steuerman 2 THE VIDEOGRAPHER: This is reel 3 number 1 of the deposition of Jerry 4 Steuerman in the matter of Martin 5 Tankleff versus the County of 6 Sufffolk, K. James McCready, et al, 7 in the U.S. District Court. We're 8 the Eastern District of New York. 9 This deposition is being held 10 at 666 Old Country Road, Suite 700, 11 Garden City, New York at the offices 12 of Barket Marion Epstein & Kearon on 13 Monday, June 10th, 2013, at 14 approximately 10:43 a.m. 15 My name is Perry Finkelstein, 16 the videographer from Pro Video 17 Productions, located in Nesconset, 18 New York, and I attest to record 19 these proceedings fairly and 20 accurately. 21 The court reporter is Dolly 22 Fevola in association with Fevola 23 Court Reporting. 24 Counsel, please introduce 25 yourselves and state the parties you

1 J. Steuerman 2 represent. 3 MR. BARKET: Bruce Barket. 4 represent the Plaintiff, Martin 5 Tankleff. 6 MS. CARMAN: Susan Scaring 7 Carman, 666 Old Country Road, 8 representing Jerry Steuerman. 9 MR. MITCHELL: Representing the 10 County of Suffolk and the Suffolk 11 County Defendants is Dennis M. 12 Brown, Suffolk County Attorney by 13 Brian C. Mitchell, Assistant County 14 Attorney. 15 THE VIDEOGRAPHER: Court 16 Reporter, please swear in the 17 witness. 18 JERRY STEUERMAN, after 19 having been first duly sworn by a Notary 20 Public of the State of New York, was 21 examined and testified as follows: 22 EXAMINATION BY 23 MR. BARKET: 24 Q State your name for the record, 25 please?

1 J. Steuerman 2 A Jerry Steuerman. 3 State your address, please. 4 6864 Willow Wood Drive, Boca 5 Raton, Florida 33434. 6 MR. BARKET: Good morning, Mr. 7 Steuerman. I'm going to ask you a 8 series of questions. If, at any 9 time, you don't understand the 10 question, just say so and I'll try 11 to rephrase it. 12 You're free to talk to your 13 attorney at any point you'd like, 14 but I ask that you not do so while a 15 question is pending. Once I ask a 16 question, you answer it or not, and 17 after that you talk to your 18 attorney, okay? 19 THE WITNESS: Okay. 20 Q Do you have any children? 21 A Four. 22 0 What are their names, please? 23 MS. CARMAN: I'd like to put on 24 the record that upon the advice of 25 counsel, Mr. Steuerman is not going

1 7 J. Steuerman 2 to be answering any questions 3 relating to the incident that 4 occurred based upon his right not to 5 incriminate himself. He'll be 6 answering just questions based on 7 his name and address. 8 MR. BARKET: How would the 9 names of his children incriminate 10 himself? 11 MS. CARMAN: I'll allow him to 12 answer those brief questions but we 13 don't want to get into any detail 14 here regarding what has transpired 15 on the date of incident because we 16 understand that you believe he is 17 the culprit of this action. 18 MR. BARKET: Okay. 19 What are the names and ages of 20 your children? 21 A Glen is 54; Barry is 52; Tod is 22 50 and Darcy is 48. 23 Where does Glen currently 24 reside? 25 On the advice of counsel, I

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1
                               J. Steuerman
 2
        invoke my fifth.
 3
                     MR. BARKET: I'm not sure how
 4
                the address of your oldest son
 5
                affects your fifth amendment rights.
 6
                     MS. CARMAN: Let me just go off
 7
                the record. I'd like to speak with
               my client outside for a minute.
 8
 9
                     MR. BARKET: Sure.
10
                     THE VIDEOGRAPHER: Going off
11
                the record at 10:57.
12
                     (Whereupon, a brief recess was
13
                taken.)
14
                     THE VIDEOGRAPHER: We're back
15
                on the record at approximately
16
                10:54.
17
                     You had a chance to speak with
18
        your attorney and I'm going to ask you again
19
        where your oldest child Glen lives?
20
                     On the advice of counsel, I
21
        invoke my fifth amendment rights.
22
                Q
                     Where does your daughter Barry
23
        live?
24
                     On the advice of counsel, I am
25
        invoking my fifth amendment rights.
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1 J. Steuerman 2 0 Your son Tod where does he 3 reside? 4 A On the advice of counsel, I am 5 invoking the fifth. 6 Did you know two individuals by 7 the name of Arlene and Seymour Tankleff? 8 A On the advice of counsel, I'm 9 invoking the fifth. 10 You know Martin Tankleff who is 11 sitting here? 12 On the advice of counsel, I'm 13 taking the fifth. 14 In or about 2003, did you 15 become aware that there was an application 16 by Marty Tankleff to vacate his conviction? 17 A On the advice of counsel, I'm 18 invoking my fifth amendment rights. 19 MR. BARKET: How could his 20 knowledge about a legal matter or 21 lack thereof affect his fifth 22 amendment rights? 23 MS. CARMAN: Are you posing 24 that question to Mr. Steuerman or to 25 myself?

10 1 J. Steuerman 2 MR. BARKET: I guess to you. 3 MS. CARMAN: Are you posing it 4 to me? 5 MR. BARKET: Yes. I don't 6 understand. I understand that he 7 wants to take the fifth about 8 questions that could affect his 9 incriminating himself, but his 10 knowledge of a pending legal matter 11 or lack thereof? 12 MS. CARMAN: Because it leads 13 to other questions that would force 14 him to uncover other knowledge. 15 MR. BARKET: Okay. 16 At some point in time, you 0 17 retained an attorney, Steven Scaring. When was that? 18 19 A I'm invoking my fifth amendment 20 rights. 21 To your knowledge, did Steven 22 Scaring have any conversations with anyone 23 from the Suffolk District Attorney's office, 24 including but not limited to Leonard Leto? 25 I'm invoking my fifth amendment A

1 11 J. Steuerman 2 rights. 3 Were you aware that you were 4 going to be asked to testify at a 440 5 hearing before Judge Braslow sometime on or 6 about 2004? 7 A I'm invoking my fifth amendment 8 rights. 9 Q Did you retain Mr. Scaring for 10 the purpose of representing you during the 11 course of the 440 in the subsequent 12 investigation? 13 I'm invoking my fifth amendment 14 rights. 15 On September 6th of 1998, where 16 did you live? 17 I'm invoking my fifth amendment A 18 rights. 19 Were you involved in a regular 20 poker game with Seymour Tankleff? 21 A I'm invoking my fifth amendment 22 rights. 23 Did you play any role in the 24 murder of either Seymour or Arlene Tankleff? 25 On the advice of counsel, I'm A

12 1 J. Steuerman 2 invoking my fifth amendment. 3 Did your son Tod have a 4 relationship with an individual by the name 5 of Joseph Creedon? 6 On the advice of counsel, I'm 7 invoking my fifth amendment rights. 8 Were you the last person to 9 leave the poker game in the early morning 10 hours of September 7, 1998; leave the 11 Tankleff residence, that is? 12 On the advice of counsel, I'm A 13 invoking my fifth amendment rights. Did you let Joseph Creedon and 14 15 Peter Kent into the Tankleff home in the 16 early morning hours of September 7, 1998? 17 A On the advice of counsel, I'm 18 invoking my fifth. 19 Did you participate in a 20 bludgeoning and stabbing of Seymour 21 Tankleff? 22 A On the advice of counsel, I'm 23 invoking my fifth. 24 Did you instruct two other 25 individuals to go down to the other end of

1	J. Steuerman 13
2	the house to check on Arlene Tankleff?
3	A I'm invoking my fifth amendment
4	rights.
5	Q At that point in time, were you
6	aware that those individuals attacked Arlene
7	Tankleff, beat and stabbed her?
8	A On the advice of counsel, I'm
9	invoking the fifth amendment.
10	Q Did you have any role in the
11	beating and stabbing, direct role, of Arlene
12	Tankleff?
13	A On the advice of counsel, I'm
14	taking the fifth.
15	Q Did you pay anyone any money in
16	connection with the attack on Seymour and
17	Arlene Tankleff?
18	A On the advice of counsel, I'm
19	taking the fifth.
20	Q Did you have any contact with
21	an individual by the name of Skippy Dwyer?
22	A On the advice of counsel, I'm
23	taking the fifth.
24	Q You're aware, of course, that
25	your son Tod was convicted of selling

1 14 J. Steuerman 2 cocaine around 1990 or so; is that right? 3 On the advice of counsel, I'm 4 taking the fifth. 5 Were you aware that Joseph 6 Creedon collected drug tests for your son 7 Tod? 8 A On the advice of counsel, I'm 9 taking the fifth. 10 Do you know an individual by 11 the name of Glass, Brian Scott Glass? 12 On the advice of counsel, I'm 13 taking the fifth. 14 Did you offer him money to 15 collect money from Seymour Tankleff? 16 On the advice of counsel, I'm A 17 taking the fifth. 18 Did you offer him money to 19 quote "send a message" to Mr. Tankleff by 20 hurting or killing him? 21 On the advice of counsel, I'm 22 taking the fifth. 23 Did Mr. Glass tell you that he 24 would collect the money but that he would be 25 able to do it without harming -- potentially

1	J. Steuerman 15
2	harming Mr. Tankleff?
3	A On the advice of counsel, I'm
4	taking the fifth.
5	Q Did he then refer you or
6	suggest that you contact Joe Creedon for
7	this activity?
8	A On the advice of counsel, I'm
9	taking the fifth.
10	Q Did you ask your son Tod to
11	speak to Joseph Creedon about attacking the
12	Tankleffs?
13	A On the advice of counsel, I'm
14	taking the fifth amendment.
15	Q Prior to September 7th of 1998,
16	have you ever spoken to Joseph Creedon?
17	A On the advice of counsel, I'm
18	taking the fifth.
19	Q Prior to September 7th of 1998,
20	have you ever spoken with Peter Kent?
21	A On the advice of counsel, I'm
22	taking the fifth.
23	Q Have you heard of an individual
24	by the name of Glen Harris?
25	A On the advice of counsel, I'm

16 1 J. Steuerman 2 taking the fifth. 3 Did you ask Joseph Creedon to 0 4 participate in the murders of Seymour and 5 Arlene Tankleff, or instruct someone else to 6 speak to him on your behalf? 7 On the advise of counsel, I'm 8 taking the fifth. 9 Did you ask Glen Harris to 10 participate in the murders of Seymour and 11 Arlene Tankleff or instruct someone else to 12 speak with Mr. Harris on your behalf? 13 On the advice of counsel, I'm 14 taking the fifth. 15 Did you pay Joseph Creedon to 16 participate in the murders of Seymour and 17 Arlene Tankleff or instruct someone else to 18 pay him on your behalf? 19 On the advice of counsel, I'm 20 taking the fifth. 21 Did you pay Peter Kent to 22 participate in the murders of Seymour and 23 Arlene Tankleff, or instruct someone else to 24 pay Mr. Kent on your behalf? 25 A On the advice of counsel, I'm

17 1 J. Steuerman 2 taking the fifth. 3 0 Were you aware that prior to 4 September 7, 1998 your son Tod had spoken to 5 Joseph Creedon about participating in the 6 murders of Seymour and Arlene Tankleff? 7 On the advice of counsel, I'm 8 taking the fifth. 9 O Did you instruct your son Tod 10 to tell Joseph Creedon in April of 1989 that 11 you wanted to cut out Martin Tankleff's 12 tongue? 13 On the advice of counsel, I'm taking the fifth. 14 15 Did you tell your son Tod in or 16 prior to April of 1989 that you wanted to 17 cut off Marty Tankleff's tongue? 18 On the advice of counsel, I'm 19 taking the fifth. 20 Did you tell your son Tod in or 21 prior to April of 1989 that you wanted to 22 cut off Martin Tankleff's tongue because you 23 were worried that the police would 24 investigate Marty's accusations against you 25 and discover they were true?

1 18 J. Steuerman 2 A On the advice of counsel, I'm 3 taking the fifth. 4 Did you testify truthfully at 5 Martin Tankleff's criminal trial? 6 On the advice of counsel, I'm 7 invoking my fifth amendment rights. 8 Did you ask your daughter Barry Q 9 to purger herself and give a false alibi at Martin Tankleff's criminal trial? 10 11 On the advice of counsel, I'm 12 invoking my fifth amendment rights. 13 Q By August of 1988 you owed 14 Seymour Tankleff a great deal of money; is 15 that correct? 16 A On the advice of counsel, I'm 17 invoking my fifth amendment rights. 18 Is it correct that you paid him 19 in cash at the poker games in return for 20 that loan? 21 I am invoking my fifth A 22 amendment rights. 23 On the early morning hours of 24 September 7th of 1988, after everyone else 25 had left, did you and Mr. Tankleff have a

19 1 J. Steuerman 2 conversation about these loans? 3 On the advice of counsel, I'm 4 invoking my fifth amendment rights. 5 Were you aware that on the desk 6 splattered with his blood was a note or a 7 demand letter from him to you asking for a 8 payment of \$50,000 towards the repayment of this loan? 9 10 A On the advice of counsel, I'm 11 invoking my fifth amendment rights. 12 Q Were you aware that a letter 13 was actually dated in June of 1988? 14 On the advice of counsel, I'm 15 invoking my fifth amendment right. 16 Did you have any discussions 17 with him at that point in time about the 18 loan and the repayment of a large sum of 19 money? 20 A On the advice of counsel, I'm 21 invoking my fifth amendment rights. 22 Were you lying at Martin 23 Tankleff's criminal trial when you testified 24 that you did not know by June of 1988 that 25 Seymour Tankleff was demanding a payment of

20 1 J. Steuerman 2 \$50,000? 3 A On the advice of counsel, I'm 4 invoking my fifth amendment rights. 5 Were you lying at Martin 6 Tankleff's criminal trial when you testified 7 that you did not remember Julie Mulcher 8 signing for a letter from Seymour Tankleff 9 on June 29th of 1998 demanding payment of 10 \$50,000? 11 On the advice of counsel, I'm 12 invoking my fifth amendment rights. 13 In August of 1988, had you made sexual advances towards Arlene Tankleff that 14 15 she rejected? 16 On the advice of counsel, I'm 17 invoking my fifth amendment rights. 18 Were you lying at trial when 19 you testified that you did not remember 20 making sexual advances towards Arlene 21 Tankleff? 22 A I'm invoking my fifth amendment 23 rights. 24 Were you lying at trial when 25 you said that you were upset over the death

21 1 J. Steuerman 2 of Arlene Tankleff? 3 I'm invoking my fifth amendment A 4 rights. 5 Q Were you lying at trial when 6 you said you were upset over the death of 7 Seymour Tankleff? 8 I'm invoking my fifth amendment A 9 rights. 10 Where was the cash coming from 11 that you were using to repay the loans for 12 Mr. Tankleff? 13 On the advice of counsel, I'm 14 invoking my fifth amendment rights. 15 Were you having trouble raising 16 sufficient money to pay back Mr. Tankleff? 17 On the advice of counsel, I'm A 18 invoking my fifth amendment rights. 19 There was a quote attributed to 20 you that you are "a poor man living like a 21 rich man; " do you remember making that 22 statement? 23 On the advice of counsel, I'm A 24 invoking my fifth amendment rights. 25 0 Do you know what your financial

1 22 J. Steuerman 2 status was in 1988? 3 A On the advice of counsel, I'm 4 invoking my fifth amendment rights. 5 0 Where did you reside at that 6 time? 7 On the advice of counsel, I'm 8 invoking my fifth. 9 Do you own or rent a home? 10 On the advice of counsel, I'm 11 invoking my fifth amendment. 12 Had Seymour Tankleff repeatedly 13 confronted you over the summer of 1988 about 14 why you were not paying back the money you 15 owed him? 16 On the advice of counsel, I'm A 17 invoking my fifth amendment. 18 On September 7, 1988, did you 19 believe that if Seymour Tankleff were to die 20 that you would not have to continue to pay 21 him the money that you owed him? 22 A On the advice of counsel, I'm 23 invoking the fifth. 24 Is it correct that after their 25 deaths the loan was settled with the Estate

1 23 J. Steuerman 2 of Mr. Tankleff at a significantly reduced 3 rate; in other words, you saved a 4 significant amount of money because of their 5 death? 6 A On the advice of counsel, I'm 7 invoking my fifth amendment rights. 8 Shortly after the Tankleffs 9 were attacked and prior to Mr. Tankleff 10 dieing, did you stage your own 11 disappearance? 12 On the advice of counsel, I'm 13 invoking the fifth. 14 Did you fake your own death at 15 that time? 16 A On the advice of counsel, I'm 17 invoking the fifth. 18 Did you travel to California a 19 few weeks after the attack on Seymour and 20 Arlene Tankleff? 21 On the advice of counsel, I'm 22 invoking the fifth. 23 Did you take money out of a 24 joint bank account held with Seymour 25 Tankleff; in other words, to finance this

1 24 J. Steuerman 2 trip to California? 3 Α On the advice of counsel, I'm invoking my fifth amendment. 4 5 Did you have a hair weave or a 6 toupee in 1998? 7 On the advice of counsel, I'm A 8 invoking the fifth amendment. 9 Did you have your hair weave 10 serviced in California in order to avoid 11 having hairs found at the scene of the 12 crimes against the Tankleffs matched to your 13 hair weave? 14 On the advice of counsel, I'm 15 invoking my fifth amendment right. 16 When was the first time you met 17 Detective McCready? 18 On the advice of counsel, I'm 19 taking the fifth. 20 Q Had you spoken with Detective 21 McCready prior to September 7th of 1988? 22 On the advice of counsel, I'm 23 taking the fifth. 24 Had you spent time with 25 Detective McCready at Digger O'Dells prior

1	J. Steuerman 25
2	to September 7th of 1988?
3	A On the advice of counsel, I'm
4	invoking the fifth.
5	Q When did you become aware that
6	your son Tod was dealing drugs, cocaine, out
7	of the bagel store that you owned?
8	A On the advice of counsel, I'm
9	invoking the fifth.
10	Q How do you support yourself
11	currently?
12	A On the advice of counsel, I'm
13	invoking the fifth.
14	Q Did you meet at any point prior
15	to 1992 Thomas Spota?
16	A On the advice of counsel, I'm
17	invoking the fifth.
18	Q At some point prior to 1988,
19	you had a dispute with a union; is that
20	right?
21	A On the advice of counsel, I'm
22	invoking the fifth.
23	Q Did you ever handcuff yourself
24	to an office or a building?
25	A On the advice of counsel, I'm

1	J. Steuerman 26
2	invoking the fifth.
3	Q Did you ever hire Hells Angels
4	or other biker groups to convince the
5	employees not to unionize?
6	A On the advice of counsel, I'm
7	invoking the fifth.
8	Q Would you be willing to answer
9	questions if you were given immunity by the
10	Attorney General's office in New York?
11	A On the advice of counsel, I
12	invoke the fifth.
13	Q Did you gamble with organized
14	crime figures in 1988?
15	A On the advice of counsel, I'm
16	invoking my fifth amendment rights.
17	Q Did you know an individual by
18	the name Ronnie Deconta?
19	A On the advice of counsel, I'm
20	invoking my fifth.
21	Q Were you aware that Ronnie was
22	an associate in the Gambino crime family?
23	A On the advice of counsel, I'm
24	invoking my fifth amendment.
25	MR. BARKET: Could we take a

27 1 J. Steuerman 2 break for about two minutes? 3 THE VIDEOGRAPHER: Going off 4 the record at approximately 11:13. 5 (At this time, a brief recess 6 was taken.) 7 THE VIDEOGRAPHER: Back on the 8 record at approximately 11:19. 9 Did you have some work done on 10 some of your stores at some point after 11 1988. 12 A On the advice of counsel, I'm 13 invoking my fifth amendment rights. 14 Do you remember an individual 15 by the name of Mr. Fisher who was a cabinet 16 maker who did some work on your stores? 17 On the advice of counsel, I'm A 18 invoking my fifth. 19 Do you remember getting angry 20 at one point while he was present and 21 shouting that you cut two people's throats 22 and you would not hesitate to do it again? 23 On the advice of counsel, I'm 24 invoking my fifth amendment rights. 25 Did you make any statements

28 1 J. Steuerman 2 concerning the Tankleff murders to anybody 3 in Florida since 2003? 4 A I'm taking my fifth amendment 5 rights. 6 Did you make a comment to an 7 employee of one of your stores down there 8 that you're an old man and what are they 9 going to do to you at this point in time? 10 I'm invoking my fifth amendment 11 rights. 12 Did you go to a local 13 restaurant or bar, Carrington's, in the fall 14 of 1987? 15 On the advice of counsel, I'm 16 taking my fifth amendment rights. 17 Specifically, on Wednesday, did 18 you attend or go to that bar and meet with a 19 Detective James McCready at that time? 20 A On the advice of counsel, I'm 21 invoking my fifth. 22 Did you ask Detective McCready 23 to speak to your daughter's sons, your 24 grandson's school? 25 A On the advice of counsel, I'm

29 1 J. Steuerman 2 invoking my fifth. 3 0 Were you ever involved in 4 running or profiting from prostitution? 5 A On the advice of counsel, I'm 6 invoking my fifth. 7 I asked you some questions 8 before about your hair weave. I want to be 9 clear that the questions were directed to 10 the time period of 1988, not 1998. 11 Did you have a hair weave or 12 toupee in 1988? 13 On the advice of counsel, I am 14 invoking my fifth amendment. 15 Did you alter that hair weave 16 in California in 1988? 17 A On the advice of counsel, I'm 18 invoking my fifth. 19 While in California, did you 20 meet with Detective McCready and other 21 people from the Suffolk County D.A.'s office 22 and Homicide Squad? 23 On the advice of counsel, I'm invoking my fifth amendment. 24 25 0 While there, did they coach you

1	J. Steuerman 30
2	on what to say when you returned?
3	A On the advice of counsel, I'm
4	invoking my fifth amendment.
5	Q When did you first meet John
6	Collins?
7	A On the advice of counsel, I'm
8	invoking my fifth amendment.
9	Q Have you ever worked as an
10	informant for the Suffolk County law
11	enforcement community?
12	A On the advice of counsel, I'm
13	invoking my fifth amendment.
14	Q Have you ever provided
15	information about criminal activity to the
16	law enforcement community?
17	A On the advice of counsel, I'm
18	invoking my fifth.
19	Q Did you pay any money to anyone
20	from Suffolk County law enforcement
21	community at any point in time to not have
22	your son arrested for his drug dealing?
23	A On the advice of counsel, I'm
24	taking the fifth.
25	Q Your son Tod, I think, was

1 31 J. Steuerman 2 arrested twice for selling drugs. The first 3 time he was represented by Thomas Spota's 4 firm; do you recall that? 5 On the advice of counsel, I'm 6 taking the fifth. 7 0 How much did you pay Thomas 8 Spota to represent your son at that point in 9 time? 10 A On the advice of counsel, I'm 11 taking my fifth. 12 Did you give him money beyond his legal fees to pay prosecutors or police 13 14 to obtain for your son a favorable 15 disposition? 16 On the advice of counsel, I'm 17 taking the fifth. 18 While your son began to sell 19 drugs after his first arrest at the bagel 20 store, were you paying police officers to 21 prevent his arrest? 22 On the advice of counsel, I'm 23 invoking my fifth amendment. 24 After his second arrest, did 25 you agree to and did your son agree to a

1	J. Steuerman 32
2	prison term to make sure you were not also
3	implicated on the drug deals?
4	A On the advice of counsel, I'm
5	invoking my fifth amendment.
6	Q Did you keep a safe in your
7	bagel store, any of your bagel stores, in
8	1988?
9	A On the advice of counsel, I'm
10	invoking my fifth amendment.
11	Q Did you meet with Detective
12	McCready in a back room where you kept
13	either a safe or large sums of cash?
14	MR. MITCHELL: At any time?
15	MR. BARKET: No, in or about
16	1988.
17	A On the advice of counsel, I'm
18	invoking my fifth amendment.
19	Q Were you involved or did you
20	know anyone in organized crime?
21	A On the advice of counsel, I'm
22	invoking my fifth.
23	Q Did you pay any money to
24	Detective McCready after the Tankleff
25	murders to make sure that you were not

1 J. Steuerman 33 2 arrested for that crime? 3 A On the advice of counsel, I'm 4 taking the fifth amendment. 5 When did you first learn of the 0 6 attack on the Tankleffs? 7 On the advice of counsel, I'm 8 invoking my fifth amendment. 9 When did you first learn that 10 Mr. Tankleff, Marty Tankleff, and other 11 members of the Tankleff family who survived 12 Arlene and Seymour were accusing you of 13 participating in the murders? 14 On the advice of counsel, I'm 15 invoking my fifth amendment. 16 After you learned that they 17 were accusing you of these murders, did you 18 speak with your daughter Barry to set up a 19 false alibi for that evening? 20 On the advice of counsel, I'm 21 invoking my fifth. 22 Why did you travel to 23 California shortly after the Tankleffs 24 attacks but before Seymour Tankleff died? 25 A On the advice of counsel, I am

1	J. Steuerman 34	
2	invoking my fifth amendment.	
3	Q Did you speak with Detective	
4	McCready prior to you fleeing to California?	
5	A On the advice of counsel, I'm	
6	invoking my fifth amendment.	
7	Q Did you speak to Detective	
8	McCready in California?	
9	A On the advice of counsel, I'm	
10	invoking my fifth amendment.	
11	Q Who represented you in the	
12	matter to settle the debt you owed the	
13	Tankleffs after the Tankleffs were murdered?	
14	A On the advice of counsel, I'm	
15	invoking my fifth amendment.	
16	Q How much money did Seymour	
17	Tankleff lend you?	
18	A On the advice of counsel, I'm	
19	invoking my fifth.	
20	Q Is it correct that he lent you	
21	approximately a half a million dollars prior	
22	to 1988?	
23	A On the advice of counsel, I'm	
24	invoking my fifth.	
25	Q Is it correct that in 1988 you	

35 1 J. Steuerman 2 still owed him several hundred thousand 3 dollars? 4 A On the advice of counsel, I'm 5 invoking my fifth. 6 Is it correct that you had a 7 payment schedule to give him money every 8 month? 9 On the advice of counsel, I'm 10 invoking my fifth amendment. 11 Is it correct that Seymour 12 Tankleff found out about the drugs that were being dealt by you and your son out of the 13 14 bagel stores? 15 A On the advice of counsel, I'm 16 invoking my fifth amendment rights. 17 Is it correct that he demanded Q 18 payment in full of all the outstanding loans 19 or he would disclose to the police that you 20 and your son were dealing cocaine out of the 21 bagel store? 22 A On the advice of counsel, I'm 23 invoking my fifth amendment rights. 24 The poker game on the, I guess, 25 the night of September 6th going into

1	J. Steuerman 36
2	September 7th of 1988, who attended it?
3	A On the advice of counsel, I'm
4	invoking my fifth.
5	Q There's been testimony that you
6	and Mr. Tankleff were, after the game had
7	broken up, were having a private discussion.
8	What were you two talking about?
9	A On the advice of counsel, I'm
10	invoking my fifth.
11	Q Did that discussion become an
12	argument?
13	A On the advice of counsel, I'm
14	invoking my fifth amendment rights.
15	Q What were you wearing on the
16	evening of September 6th of 1988?
17	A On the advice of counsel, I'm
18	invoking my fifth.
19	Q Did the police ever ask you
20	what you were wearing on the night of
21	September 6, 1988?
22	A On the advice of counsel, I'm
23	invoking my fifth amendment rights.
24	Q Did you ever produce the
25	clothing you were wearing that evening for

37 1 J. Steuerman 2 examination for blood? 3 On the advice of counsel, I'm 4 invoking my fifth amendment. 5 Q Did you give the address of 6 where the Tankleffs lived to your son Tod 7 prior to September 7th of 1988? 8 On the advice of counsel, I'm 9 invoking the fifth. 10 Did you give Joseph Creedon the 11 address of where Seymour and Arlene Tankleff 12 lived on September 7, 1988? On the advice of counsel, I'm 13 A 14 invoking my fifth amendment. 15 Just prior to Mr. Tankleff 16 being attacked, was there any discussions 17 between you and him concerning the repayment 18 of the loans? 19 On the advice of counsel, I'm 20 invoking my fifth amendment. 21 Did you bring in Mr. Creedon 22 and others to threaten and intimidate Mr. 23 Tankleff prior to him being attacked? 24 On the advice of counsel, I'm 25 invoking the fifth amendment.

38 1 J. Steuerman 2 How many times have you spoken 0 3 to Mr. Creedon since September 7, 1988? 4 Α On the advice of counsel, I'm 5 invoking my fifth amendment. 6 Did your son and Mr. Creedon, 7 to your knowledge, your son Tod, have a 8 falling out in the spring of 1988 because he 9 refused to pay Mr. Creedon for the attack on 10 the Tankleffs? 11 On the advice of counsel, I am 12 invoking the fifth amendment. 13 It's been reported that your 14 son attacked Mr. Creedon in 1989 and there 15 was some financial dispute at the core or 16 financial problem at the core of the 17 dispute; are you aware of that? 18 On the advice of counsel, I'm 19 invoking my fifth amendment rights. Why did your son shoot at or 20 21 shoot Joe Creedon, your son Tod? 22 On the advice of counsel, I'm A 23 invoking my fifth amendment. 24 How much time did your son Tod 25 serve for the second time he was convicted

39 1 J. Steuerman 2 of selling drugs from the bagel store? 3 On the advice of counsel, I'm 4 invoking my fifth amendment. 5 Q Were you ever charged with 6 selling drugs from the bagel store? 7 On the advice of counsel, I 8 take the fifth amendment. 9 When did you first become aware 0 10 that your son was selling cocaine out of the 11 bagel store that you owned with Mr. 12 Tankleff? 13 A On the advice of counsel, I'm invoking the fifth amendment. 14 15 Do you know an individual by 16 the name of Paul Ram? 17 On the advice of counsel, I'm 18 invoking my fifth amendment. 19 Did you know an individual by 20 the name of William or Billy Ram? 21 A On the advice of counsel, I'm 22 invoking my fifth amendment. 23 Prior to September 7th of 1988, 24 did you offer money to individuals to murder 25 Seymour Tankleff?

40 1 J. Steuerman 2 A On the advice of counsel, I'm 3 invoking my fifth amendment. 4 Q Prior to September 7th of 1988, 5 specifically, did you pay Joe Creedon and 6 Joseph Graden a sum of money to attack Mr. 7 Tankleff at the bagel store? 8 A On the advice of counsel, I'm 9 invoking my fifth amendment rights. 10 Did you ever meet an individual 11 by the name of Joseph Graden? 12 A On the advice of counsel, I'm 13 invoking my fifth amendment rights. 14 MR. BARKET: I think that's all 15 I have under the circumstances. 16 Just to be clear, if I were to 0 17 ask you any other questions concerning the 18 Tankleff murders, you would continue to 19 invoke the fifth? 20 On advice of counsel, I will 21 invoke the fifth. 22 MR. BARKET: Thank you. 23 MR. MITCHELL: If I speak 24 loudly, is that all right? 25 THE WITNESS: Yes.

1 J. Steuerman 41 2 MR. MITCHELL: If I'm correct, 3 Mr. Barket, you intend to submit 4 this transcript to the court for a 5 determination as to whether Mr. 6 Steuerman's invocation of the fifth 7 amendment is appropriate on certain 8 questions; is that correct? 9 MR. BARKET: Yes. 10 MR. MITCHELL: In the event 11 that the court rules that there were 12 times where invoking that privilege 13 was not appropriate, it's my 14 assumption that we will then come 15 back and ask Mr. Steuerman those 16 questions. Is that the game plan to 17 use that phrase? 18 MR. BARKET: Yes. 19 MR. MITCHELL: Because there 20 were certain questions that you 21 asked that I would have objected to 22 on form, but I withheld those now 23 and will, if appropriate, make those 24 objections should we come back. 25 MR. BARKET: Okay.

1	J. Steuerman 42
2	MR. MITCHELL: All right.
3	That's all.
4	MS. CARMAN: That's all.
5	THE VIDEOGRAPHER: Concluding
6	the deposition. Going off the
7	record at approximately 11:35.
8	(Time noted: 11:35 a.m.)
9	
10	
11	
12	JERRY STEUERMAN
13	
14	Subscribed and sworn to before me
15	this day of, 2013.
16	
17	
18	
19	NOTARY PUBLIC
20	
21	
22	
23	
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1	44						
2	ERRATA SHEET FOR THE TRANSCRIPT OF: Case Name: Martin Tankleff vs The County of Suffolk, K. James McCready, Et Al Deposition Date: June 10, 2013						
3							
4	Witness: Jerry Steuerman						
5	CODRECTIONS						
6	CORRECTIONS  DO IN NOW DEADS SHOULD BEAD DEAGON FOR						
7	PG LN NOW READS SHOULD READ REASON FOR						
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20							
21	Signature						
22	Jighacuic						
23	Subscribed and sworn to before me						
24	this day of, 2013.						
25	(NOTARY PUBLIC)						
	(NOTINE LODDIC)						
	FEVOLA REPORTING & TRANSCRIPTION INC. (631) 724-7576	_					

CERTIFICATION I, DOLLY FEVOLA, a Notary Public in and for the State of New York, do hereby certify: THAT the witness whose testimony is herein before set forth, was duly sworn by me; and THAT the within transcript is a true record of the testimony given by said witness. I further certify that I am not related, either by blood or marriage, to any of the parties to this action; and THAT I am in no way interested in the outcome of this matter. IN WITNESS WHEREOF, I have hereunto set my hand this 12th day of July, 2013. DOLLY FEVOLA 

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